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October 13, 2000

RECEIVED
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EXECUTIVE SECRETARY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

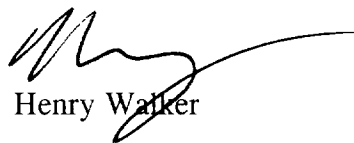
In Re: *Generic Docket to Establish UNE Prices for Lines Sharing per FCC 99-355, and
Riser Cable and Terminating Wire as Ordered in TRA Docket 98-00123.*
Docket No. 00-00544

Dear David:

Please find enclosed the original and thirteen copies of a Motion to Take Depositions filed on behalf of the Data Coalition in the above referenced proceeding. Please bring this to the attention of Director Lynn Greer, the Hearing Officer in this proceeding.

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:



Henry Walker

HW/nl
Attachment
c: Parties

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE


In re: Generic Docket To Establish UNE Prices)
for Line Sharing Per FCC 99-355, and) Docket No. 00-00544
Riser Cable and Terminating Wire as)
Ordered in TRA Docket 98-00123)

MOTION TO TAKE DEPOSITIONS

Intervenor, the Data Coalition, moves to take the depositions of an employee and of one or more subject matter experts of BellSouth Telecommunications, Inc. Upon information and belief, the Data Coalition submits that the Coalition will not be able to obtain sufficient information concerning BellSouth's Operation Support Systems for line sharing without these depositions. The cost of upgrading those support systems in order to support the offering of xDSL services is one of the most significant issues in this proceeding. In similar proceedings in other jurisdictions, BellSouth has failed to produce at the hearing any witnesses who were competent to testify about this subject. To avoid facing a similar situation in Tennessee, the Data Coalition is now asking BellSouth to identify those subject matter experts and to produce them, along with Tommy Williams, BellSouth's project manager for line sharing, for the purpose of giving depositions prior to the hearing. The Coalition believes that these depositions will provide the Authority with important and relevant information needed to decide

this case and will also allow the Authority to hear this matter in less time than would otherwise be required.

Respectfully submitted,

By: _____

Henry Walker

Boult, Cummings, Conners & Berry, PLC

414 Union Street, Suite 1600

P. O. Box 198062

Nashville, Tennessee 37219

(615) 252-2363

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE**

)
In Re: Generic Docket to Establish UNE)
Prices for Lines Sharing per FCC 99-355,))
and Riser Cable and Terminating Wire)
as Ordered in TRA Docket 98-00123.)

Docket No. 00-00544

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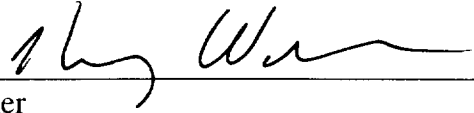
NOTICE TO TAKE DEPOSITION OF TOMMY WILLIAMS

TO: Tommy Williams
BellSouth Telecommunications, Inc.
c/o Guy Hicks
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

Intervenor, the Data Coalition, hereby notifies you that the deposition of Tommy Williams, Project Manager for Line Sharing for BellSouth, will be taken, pursuant to Rule 30 of the Tennessee Rules of Civil Procedure, at the offices of Boulton, Cummings, Connors & Berry, PLC, 414 Union Street, Suite 1600, Nashville, Tennessee 37219, on the 20th day of October, 2000, or such other date and time as the parties may agree, commencing at 9:00 a.m. and continuing until completed. Such deposition shall be conducted before a court reporter who is not of counsel for either of the parties or a relative or employee of such parties or an attorney interested in this action. **You are hereby notified to appear and take part in said deposition at the time and place indicated above.**

Dated this 13th day of October, 2000.

Respectfully submitted,

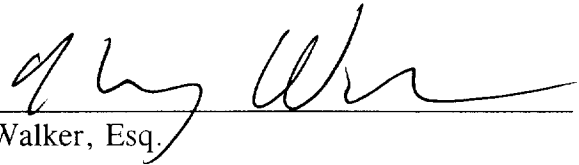


Henry Walker
BOULT, CUMMINGS, CONNERS & BERRY, PLC
414 Union Street, Suite 1600
P.O. Box 198062
Nashville, TN 37219
(615) 244-2582

Attorney for the Data Coalition

Certificate of Service

I hereby certify that a true and correct copy of the foregoing document has been forwarded, via U.S. mail, postage prepaid, to Guy M. Hicks, BellSouth Telecommunications, Inc., 333 Commerce Street, Suite 2101, Nashville, TN 37201-3300, on this the 13th day of October, 2000.



Henry Walker, Esq.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE**

)
In Re: Generic Docket to Establish UNE)
Prices for Lines Sharing per FCC 99-355,))
and Riser Cable and Terminating Wire)
as Ordered in TRA Docket 98-00123.)

Docket No. 00-00544

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**NOTICE TO TAKE DEPOSITION OF THE FOLLOWING SUBJECT MATTER
EXPERT(S)**

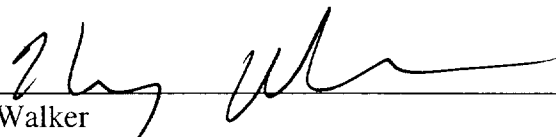
TO: Guy M. Hicks
BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

Intervenor, the Data Coalition, hereby notifies you to produce the following subject matter expert(s) for the purpose of giving a deposition in the above captioned proceeding. You are requested to produce the subject matter expert(s) for line sharing operation support systems updates, including the person(s) who can explain with specificity the cost of the project, the type of upgrades required, the functionality of the upgrades, the work activities necessary to complete the upgrades, the type of employees/consultants BellSouth will use for completing and maintaining the upgrades, and the extent to which these upgrades presently or will benefit other BellSouth operations (including retail) or UNE products other than line sharing. The deposition(s) of the subject matter expert(s) will be taken, pursuant to Rule 30 of the Tennessee Rules of Civil Procedure, at the offices of Boulton, Cummings, Conners & Berry, PLC, 414 Union Street, Suite

1600, Nashville, Tennessee 37219, on the 20th day of October, 2000, or such other date and time as the parties may agree, commencing at 1:00 p.m. and continuing until completed. Such deposition shall be conducted before a court reporter who is not of counsel for either of the parties or a relative or employee of such parties or an attorney interested in this action. **You are hereby notified to appear and take part in said deposition at the time and place indicated above.**

Dated this 13th day of October, 2000.

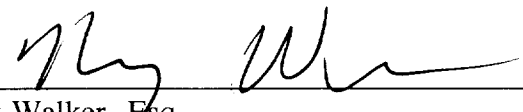
Respectfully submitted,


Henry Walker
BOULT, CUMMINGS, CONNERS & BERRY, PLC
414 Union Street, Suite 1600
P.O. Box 198062
Nashville, TN 37219
(615) 244-2582

Attorney for the Data Coalition

Certificate of Service

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Henry Walker, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, and/or facsimile to the following on this ~~13th~~ day of ~~August~~ 2000.

13th October

Guy M. Hicks
BellSouth Telecommunications, Inc.
Suite 2101
333 Commerce Street
Nashville, Tennessee 37201-3300

James B. Wright
United Telephone-Southeast, Inc.
Sprint Communications Company, L.P.
14111 Capital Boulevard
Wake Forest, North Carolina 27587-5900

Jon Hastings
Boult, Cummings, Conners & Berry, PLC
414 Union Street, Suite 1600
Nashville, Tennessee 37219

Charles B. Welch, Jr.
Farris Mathews Branam Bobango & Hellen PLC
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Nashville, Tennessee 37219

T.G. Pappas
R. Dale Grimes
Bass, Berry & Sims PLC
315 Deadrick Street, Suite 2700
Nashville, Tennessee 37238-0002

Jim Lamoureux, Esq.
AT&T Communications of the South
1200 Peachtree Street
Room 4060
Atlanta, GA 30309

